

Schneider, Jana

From: Hall, Steven G. [SGHall@ene.com]
Sent: Friday, July 26, 2013 2:49 PM
To: Fowlow, Jeffrey
Subject: RE: Fw: ASHUE

Categories: janet-foia

I think he was just focusing on the sentence he wanted to see deleted and didn't notice or forgot about the sentence right before. One of those forest-for-the-trees situations.

From: Fowlow, Jeffrey [<mailto:Fowlow.Jeffrey@epa.gov>]
Sent: Friday, July 26, 2013 4:27 PM
To: Hall, Steven G.
Subject: FW: Fw: ASHUE

From: Fowlow, Jeffrey
Sent: Friday, July 26, 2013 2:26 PM
To: Irizarry, John; Lee, Eugene
Subject: RE: Fw: ASHUE

John, could you please call me? My cell is 206-225-5582.

Aren't I already defining "ACM" by NESHAPs as greater than 1% using PLM (see blue highlights)?

From: Irizarry, John
Sent: Friday, July 26, 2013 2:06 PM
To: Fowlow, Jeffrey; Lee, Eugene
Subject: Re: Fw: ASHUE

That and the NESHAP definition of 1%.

From: Fowlow, Jeffrey
Sent: Friday, July 26, 2013 1:40:17 PM
To: Irizarry, John; Lee, Eugene
Subject: RE: Fw: ASHUE

John/Eugene: Below is an excerpt from the AM. If I understand Eugene's comment (further below), Tito would like us to remove the highlighted sentence from the AM. Everything else stays the same, correct?

It is currently anticipated that the removal action will be conducted as a Comprehensive Environmental Response, Compensation, and Liability Act Fund-lead removal action by the United States Environmental Protection Agency. A Potentially Responsible Party may step forward before or during the removal action and conduct or complete the cleanup with oversight by the EPA. The scope of the removal action is limited to asbestos-contaminated debris and asbestos-containing materials. Per the National Emission Standards for Hazardous Air Pollutants, ACM means any material containing more than 1 percent asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR Part 763, section 1, Polarized Light Microscopy. For the purposes of this document, asbestos-contaminated debris will be defined as any material containing 1% or less asbestos. Other environmental

concerns at the Site, if present, may be addressed as an amendment to the existing scope of work or as a separate action.

From: Irizarry, John
Sent: Friday, July 26, 2013 9:37 AM
To: Fowlow, Jeffrey
Subject: Fw:

Jeff,

Tito was concerned about the use of 1% measure and the definition of asbestos as 1% or less. See suggestion below on a possible way to edit the AM.

I'm compressed today and the system is not letting me log in from my computer so please excuse me for any typos in this email.

Feel free to call me if you want to discuss further. 202-431-7928.

From: Lee, Eugene
Sent: Friday, July 26, 2013 9:08:13 AM
To: Irizarry, John
Subject:

John,

So, one way I think the region can address Tito's concerns about referencing 1% is to say:

...scope of the removal action is limited to and acm as defined by NESHAPs using methods

then, just drop the sentence starting "For purposes..."

The scope of the removal action is limited to asbestos-contaminated debris and asbestos-containing materials. Per the National Emission Standards for Hazardous Air Pollutants, ACM means any material containing more than 1 percent asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR Part 763, section 1, Polarized Light Microscopy. For the purposes of this document, asbestos-contaminated debris will be defined as any material containing 1% or less asbestos. Other environmental concerns at the Site, if present, may be addressed as an amendment to the existing scope of work or as a separate action.

EL

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